IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE AT KNOXVILLE

UNITED STATES OF AMERICA,)		
)		
v.)	No.	3:17-CR-82
)		
RANDALL KEITH BEANE)	JUDGE VARLAN	
RANDALL KEITH BEANE)	JUDGE VARLAN	

MOTION BY DEFENDANT RANDALL KEITH BEANE TO EXTEND DEADLINE FOR OBJECTIONS TO PRESENTENCE INVESTIGATION REPORT

COMES the Defendant Randall Keith Beane, through his elbow counsel, and moves this Court for an extension of the deadline for the Objections to the Presentence Investigation Report (hereafter "PSR"). In support of this Motion and for good cause shown, the Defendant states as follows:

- 1. The Sentencing in this case is currently set for July 24, 2018.
- 2. The Sentencing Memorandum is currently due on July 10, 2018.
- 3. The Objections to the PSR is currently due this day, June 27, 2018.
- Defendant received the PSR in Ocilla via fax during a telephone conference call with elbow counsel on June 15, 2018.
- 5. Elbow Counsel has spoken with Defendant about the PSR via telephone conference calls from Ocilla, GA. Defendant has made elbow counsel aware that he requires more time to determine what objections to the PSR, if any, he will file.
- 6. The Defendant is requesting an extension of the deadline for Objections to the PSR.
- 7. Defendant believes that there is no prejudice to any party if this motion is granted.
- 8. Further, Defendant believes this extension to be the most efficient path for all parties involved under the circumstances.
- 9. This extension is necessary for the interests of justice.

WHEREFORE, the Defendant respectfully requests an extension of the deadline for the

Objections to the PSR in this matter up to and including July 2, 2018.

Respectfully submitted this 27th day of June, 2018.

s/Stephen G. McGrath Stephen G. McGrath (BPR # 025973) 9111 Cross Park Drive Bldg D - Suite 200 Knoxville, TN 37923 Phone: (865) 540-8871

Fax: (865) 540-8866

"Elbow Counsel" for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of this document has been served upon counsel for all parties of record in this case via this Court's electronic filing system on this 27th day of June, 2018.

> s/Stephen G. McGrath Stephen G. McGrath